

Remarks

The Examiner now contends that claims 1 to 4, 6 to 8 and 10 to 15 are unpatentable under 35 U.S.C. 103(a) over Miloslavsky (US5915012) in view of Goecke (US6175564). Applicants respectfully disagree for the following reasons.

Claim 1 of the present invention reads as:

"A method of routing a contact in a network comprising a plurality of contact centers, said method comprising the steps of:-

- a) receiving a contact at any one of the contact centers, said any one of the contact centers being designated a source contact center with respect to the received contact;*
- b) sending a reservation request from the source contact center to each of the contact centers including itself at the same time, said reservation request being for an agent with a specified relative intrinsic value;*
- c) for said reservation request, receiving at the source contact center from each of one or more of the contact centers, a value of the specified intrinsic and an associated agent identifier;*
- d) at said designated source contact center, determining from said value of the specified intrinsic and said associated agent identifier received from said each of one or more of the contact centers a suitable agent in any of said one or more of the contact centers for processing the received contact;*
- e) routing the received contact from the designated contact center to said suitable agent".*

In the Examiner's view, the feature (a) of claim 1, to wit, *"receiving a contact at any one of the contact centers, said any one of the contact centers being designated a source contact center with respect to the received contact"* is disclosed by Miloslavsky at column 2, line 30 to 33 and column 5, lines 5 to 9.

Miloslavsky at column 2, line 30 to 33 and column 5, lines 5 to 9 reads as:

"An example of a system using the architecture of the present invention is a multiple call center's system. An incoming call arrives at an automatic call distributor of a first call center" and

"Stat-server 190 collects and stores historic data relating to all calls, activities of switches, and information and activities of all agents and telephones in all the call centers".

Where is it disclosed in these excerpts of Miloslavsky or indeed anywhere in this reference that a contact center receiving a contact is *designated* as a *source contact center with respect to the received contact*? The Examiner should explain this because it is not possible for the applicants to understand how the Examiner reaches such a conclusion from the foregoing two brief excerpts of Miloslavsky which make no mention of *designating* any contact center as a *source contact center* with respect to any received contact.

In the Examiner's view, the feature (b) of claim 1, to wit, *"sending a reservation request from the source contact center to each of the contact centers including itself at the same time, said reservation request being for an agent with a specified relative intrinsic value"* is disclosed by Miloslavsky at column 2, line 30 to 52 and column 6, lines 46 to 56.

Miloslavsky at column 2, line 30 to 52 and column 6, lines 46 to 56 reads as:

"An example of a system using the architecture of the present invention is a multiple call center's system. An incoming call arrives at an automatic call distributor of a first call center. The CTI server sends the information (using API events) to the stat-server and the routing server. The routing server retrieves information regarding the call (e.g., previous ordering information originated from

the phone placing the call) from a database and the status of agents from the stat-server. If the best available agent to handle the call is located in a second call center, the routing server requests the CTI server of the second call center to reserve a routing point in its matching automatic call distributor. The routing server then instructs the CTI server of the first call center to cause its matching automatic call distributor to transfer the call to the reserved routing point of the automatic call distributor in the second call center. After the call is transferred, the CTI server of the second call center notifies the routing routine. The routing routine routes this call to the selected agent in the second call center. The routing routine also delivers information from the database to a workstation used by the agent. As a result, the best available agent is able to handle the call and all pertinent information delivered thereto" and

"Stat-server 190 provides a set of application programming interfaces (APIs) for its clients to obtain statistics for various objects, such as objects associated with agents, agent groups, places, place groups, route points, queues, etc. Statistics could be current objects states representation (e.g., current agent status, current number of active calls in a group, etc.) or historical states representation. Historical representation are accumulated information for certain time intervals (e.g., total number of calls, total talk time, average talk time, etc.). Thus, the clients have to specify the time interval of interest".

Where is it disclosed in these excerpts of Miloslavsky or indeed anywhere in this reference that a contact center sends a *reservation request* from the *source contact center* to each of the contact centers including itself at the same time? The Examiner should explain this because it is not possible for the applicants to understand how the Examiner reaches such a conclusion from the foregoing two excerpts of Miloslavsky which make no mention of using a designated source contact center to send a reservation request to all contact centers including itself at the same time. One only has to read the excerpts of Miloslavsky quoted by the Examiner to see that it teaches nothing of the sort. It is beyond doubt that information about a call received at a contact

center is sent to the routing server and it is the routing server that processes such information based on other information retrieved from the stats server to identify a suitable agent to take the call. This in no way involves sending a reservation request from a contact center designated as a source contact center for a received contact, or of sending said reservation requests to all contact centers including itself, or of doing so at the same time.

If the Examiner remains of the view that Miloslavsky teaches feature (b) then it is requested that he clearly explain the features of Miloslavsky that support his contention. Beyond pointing out that one skilled in the art could not possibly arrive at the same conclusion based on the quoted excerpts of Miloslavsky or indeed any of the disclosure of Mikloslavsky, the applicants are not able to more fully respond to the Examiner's contention because it is not at all clear how the Examiner can make such a contention.

In the Examiner's view, the feature (c) of claim 1, to wit, "*for said reservation request, receiving at the source contact center from each of one or more of the contact centers, a value of the specified intrinsic and an associated agent identifier*" is disclosed by Miloslavsky at column 2, line 30 to 52 and column 6, lines 46 to 56. These two excerpts are already referred to above.

Where is it disclosed in these excerpts of Miloslavsky or indeed anywhere in this reference that a contact center designated as a source contact center for a received contact itself receives from each of one or more of the other contact centers a value of a specific intrinsic and an agent identifier? The Examiner should explain this because it is not possible for the applicants to understand how the Examiner reaches such a conclusion from the aforementioned two excerpts of Miloslavsky which make no mention of this feature. Once again, it is abundantly clear from Miloslavsky that it is the routing server and not any of the contact centers that receives and processes information for determining a suitable agent to receive a call.

If the Examiner remains of the view that Miloslavsky teaches feature (c) then he is requested to clearly explain the features of Miloslavsky that support his contention. Beyond pointing out that one skilled in the art could not possibly arrive at the same conclusion based on the quoted excerpts of Miloslavsky or indeed any of the disclosure of Mikloslavsky, the applicants are not able to more fully respond to the Examiner's contention because it is not at all clear how the Examiner can make such a contention.

In the Examiner's view, the feature (d) of claim 1, to wit, *"at said designated source contact center, determining from said value of the specified intrinsic and said associated agent identifier received from said each of one or more of the contact centers a suitable agent in any of said one or more of the contact centers for processing the received contact"* is disclosed by Miloslavsky at column 2, line 30 to 52 and column 6, lines 46 to 56. These two excerpts are already referred to above.

Where is it disclosed in these excerpts of Miloslavsky or indeed anywhere in this reference that a contact center designated as a source contact center for a received contact itself determines a suitable agent to receive a call? The Examiner should explain this because it is not possible for the applicants to understand how the Examiner's reaches such a conclusion from the aforementioned two excerpts of Miloslavsky which make no mention of this feature. Once again, it is abundantly clear from Miloslavsky that it is the routing server and not any of the contact centers that receives and processes information for determining a suitable agent to receive a call. There is absolutely no suggestion in Miloslavsky that a contact center is arranged to receive information about available agents from other contact centers including itself and to process this information to determine a suitable agent for handling a received contact. Miloslavsky is consistent with other prior art systems in teaching that separate means (such as a routing server) to the contact centers are provided in the system for processing contact/call information etc. to determine a suitable agent to handle a contact/call. It is not possible to construe the language of the claims on file to read onto what is disclosed in Miloslavsky nor is it possible to construe the content of Miloslavsky as teaching the significant features of the claimed invention as alleged.

If the Examiner remains of the view that Miloslavsky teaches feature (c) then he is requested to clearly explain the features of Miloslavsky that support his contention. Beyond pointing out that one skilled in the art could not possibly arrive at the same conclusion based on the quoted excerpts of Miloslavsky or indeed any of the disclosure of Mikloslavsky, the applicants are not able to more fully respond to the Examiner's contention because it is not at all clear how the Examiner can make such a contention.

It is simply not acceptable or reasonable for the Examiner to merely quote excerpts of claim 1 as currently pending and to then point by column and line number to sections of Miloslavsky, without any explanation, as teaching said claim features when it is clear from applicants' submissions here and on previous occasions that such contentions cannot be supported by any reasonable understanding of the disclosure of this reference. Given the nature of these contentions, it is difficult to provide any sensible and reasoned response since the contentions themselves lack any proper reasoning. Furthermore, the lack of a proper reasoned basis to support the Examiner's contentions as to what Miloslavsky teaches places the applicants in an invidious position of having no understanding of basis for the Examiner's 103(a) rejection to the degree it is based on the disclosure of Miloslavsky.

It can be seen from the foregoing that many of the present claims features which the Examiner contends are disclosed by Miloslavsky are not, in fact, disclosed by this reference.

Therefore, even if one skilled in the art modified Miloslavsky to replace the set of boxes (comprising the routing server 192, the statistics server 190 and the database 194) common to the plurality of contact centers by a separate set of such boxes/means at each contact center, it would not lead to the invention as claimed because the modified system would still not involve at least the features of sending a reservation request from a contact center designated as a source contact center with respect to a received contact to each of the contact centers including itself at the same time; or for said

reservation request, receiving at the source contact center from each of one or more of the contact centers, a value of the specified intrinsic and an associated agent identifier; or at said designated source contact center, determining from said value of the specified intrinsic and said associated agent identifier received from said each of one or more of the contact centers a suitable agent in any of said one or more of the contact centers for processing the received contact.

Furthermore, Miloslavsky teaches a network level routing system (abstract). As such, one skilled in the art would not seriously contemplate replacing the network level routing system taught by Miloslavsky by the individual contact center level routing subsystems taught by Goecke because to do so would go against the stated purpose of Miloslavsky and would incur considerable expense beyond that of providing a single network level routing system.

In fact, a skilled person faced with the disclosure of Miloslavsky would view modifying the system of this reference to replace the network level routing system taught by Miloslavsky by the individual contact center level routing subsystems taught by Goecke as a retrograde step because the network level routing system of Miloslavsky is provided to address problems of prior art systems where the contact centers have their own routing subsystems (column 3, line 66 to column 4, line 4).

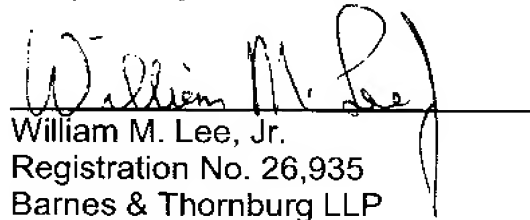
It can be seen in the present invention as claimed that any one of the plurality of contact centers can be designated as a source contact center in respect of a contact received at that contact center. Another contact center can be designated as a source contact center for another subsequent contact received at that contact center. Thus, any contact center can be designated a source contact center for a respective contact received thereby. Each of said plurality of contact centers is arranged in response to being designated as a source contact center for a received contact to send a reservation request from said contact center to all of the contact centers including itself at the same time. Subsequently, upon receiving at the designated source contact center a value of a specified intrinsic and an associated agent identifier from each of

one or more of the contact centers, it (i.e. the designated contact center itself) determines from said value of the specified intrinsic and said associated agent identifier received from said each of one or more of the contact centers a suitable agent in any of said one or more of the contact centers for processing the received contact and routes the contact from the designated contact center to said suitable agent. Therefore, it is a feature of the network of contact centers that if any one of the contact centers becomes inoperable it does not prevent the remaining contact centers from implementing the foregoing contact sharing scheme between them because there is no single means common to the contact centers responsible for selecting an agent and routing a contact from one contact center to another. This arrangement is much more fault tolerant than the *network level routing system* disclosed by Miloslavsky.

In view of the foregoing, favorable reconsideration of the claims as amended is respectfully requested.

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Respectfully submitted,

A handwritten signature in black ink, appearing to read "William M. Lee, Jr.", is written over a horizontal line.

William M. Lee, Jr.
Registration No. 26,935
Barnes & Thornburg LLP
P.O. Box 2786
Chicago, Illinois 60690-2786
(312) 214-4800
(312) 759-5646 (fax)